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*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Brandon Kotaniemi, individually and as special  
co-administrator of the Estate of Marsha  
Kotaniemi; Steven Kotaniemi, individually and  
as special co-administrator of the Estate of  
Marsha Kotaniemi,

Plaintiffs,

v.

Brian C. Ward, MD, an individual in his  
official capacity; Stephanie Martinez, MD,  
an individual in her official capacity; Emily  
Tibbits, MD, an individual; Lisa Angotti,  
MD an individual; State of Nevada ex rel  
The Board of Regents of the Nevada System  
of Higher Education ex rel the University of  
Nevada, Las Vegas, a political subdivision;  
DOE INDIVIDUALS I-X, inclusive; and  
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**Stipulation and Order for Extension of  
Time to Respond to Complaint**

**(FOURTH REQUEST)**

Federal Defendants, Emily Tibbits, MD, and Lisa Angotti, MD (“Federal Defendants”), and Plaintiffs, through their undersigned counsel, stipulate and agree that Federal Defendants be granted an extension from **May 13, 2025**, to **May 27, 2025**, to file a response to Plaintiff’s complaint.

1. Plaintiffs filed their complaint in the Eighth Judicial District Court Clark

1 County, Nevada on February 4, 2025.

2 2. Federal Defendants removed this case to the United States District Court,  
3 District of Nevada on March 24, 2025.

4 3. Plaintiffs and Federal Defendants entered into a stipulation granted by this  
5 Court extending the time for Federal Defendants to respond to the complaint through April  
6 16, 2025 (ECF No. 9).

7 4. Plaintiffs and Federal Defendants entered into another stipulation granted by  
8 this Court extending the time for Federal Defendants to respond to the complaint through  
9 April 29, 2025 (ECF No. 13).

10 5. Plaintiffs and Federal Defendants entered into a subsequent stipulation  
11 granted by this Court extending the time for Federal Defendants to respond to the  
12 complaint through May 13, 2025 (ECF No. 17) to allow Plaintiffs and Federal Defendants  
13 further time to discuss the procedural posture of the case.

14 6. Plaintiffs and Federal Defendants now stipulate and agree to extend the time  
15 for the United States to respond to Plaintiffs' complaint through May 27, 2025.

16 7. At the time of filing their initial complaint in the state court action, Plaintiffs  
17 were unaware that Federal Defendants were Air Force doctors and federal employees.  
18 Plaintiffs have not yet exhausted their administrative remedies under the FTCA. As such,  
19 Plaintiffs and Federal Defendants anticipate filing a Stipulation and Order for Dismissal  
20 without Prejudice, to enable Plaintiffs to file their FTCA administrative claims. However,  
21 the additional time is necessary for Plaintiffs to confer with their counsel prior to doing so.

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As such, this stipulated request is brought in good faith and not for the purpose of undue delay.

Respectfully submitted this 13<sup>th</sup> day of May 2025.

SIGAL CHATTAH  
United States Attorney

THE POWELL LAW FIRM

/s/ Tom W. Stewart  
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*Attorney for Plaintiffs*

/s/ Karissa D. Neff  
KARISSA D. NEFF  
Assistant United States Attorney  
  
*Attorneys for Federal Defendants*

**IT IS SO ORDERED:**

  
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Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
DATED: 5/14/2025